



Geomatrix

November 9, 2007
Project No. 13636

Mr. J. Ryan Benefield, P.E.
Chief, Hazardous Waste Division
Arkansas Department of Environmental Quality
8001 National Drive
Little Rock, Arkansas 72219-8913

Subject: Third Monthly Status Report (October 1st to 31st, 2007)
Cedar Chemical Company Facility ("the Site")
West Helena, Arkansas
State EPA ID No. ARD990660649

Dear Mr. Benefield:

This letter constitutes the Third Monthly Status Report (October 1 to 31st, 2007) summarizing our work efforts. This status report is being submitted under the scope of work and schedule presented to the Arkansas Department of Environmental Quality (ADEQ) on August 8, 2007. Summarized below are the activities completed in October 2007 and the activities planned for the site in November 2007.

Since the issuance of the Consent Administrative Order (CAO) in March 2007 and as presented in the August 8th meeting with ADEQ, a site tour and consultant interview and selection, Well Assessment and Well Assessment Report, and opening of an escrow account were completed. During the August 8th meeting with ADEQ, the projected path forward for the Site was presented and a schedule for implementation and specific CAO provisions were discussed. The information below details the planned and anticipated work and the progress of the CAO items.

Specific Work Completed in 2007

General Site Activities

- On June 12, 2007, EnSafe, Inc. performed a monitoring well assessment of the 37 wells located at the Site. During the meeting with ADEQ on August 8, 2007, the Well Assessment Report was submitted to ADEQ. On September 13, 2007, ADEQ responded with comments on the Well Assessment Report and with additional requirements to be addressed during the upcoming phases of work.

Current Conditions Report

- During the August 8, 2007 meeting with ADEQ, Geomatrix proposed the preparation of a Current Conditions Report (CCR) to compile available data and identify critical data gaps. Work on this task is in progress. Our proposal included the following tasks after completion of the CCR:



Mr. J. Ryan Benefield, P.E.
Arkansas Department of Environmental Quality
November 9, 2007
Page 2

Site Investigation Work Plan

- Following the submittal of the CCR, Geomatrix will prepare an investigation work plan to fill critical data gaps identified in the CCR.

Site Investigation

- Following the approval of the Site Investigation Work Plan, to be submitted at a later date, Geomatrix will complete a site investigation to fill the critical data gaps.

Site Investigation Report

- Following the completion of the site investigation, Geomatrix will submit the Site Investigation Report.

Feasibility Study

- Following the Site Investigation Report, Geomatrix will complete and submit a Feasibility Study to identify a recommended site remedy.

Other Activities

- On October 21, 2007, the Group submitted a letter to ADEQ requesting an extension to submit the Current Conditions Report. The original due date of the report was November 6, 2007. On October 23, 2007, ADEQ granted the request for extension to submit the report on November 20, 2007. Geomatrix has collected additional data and information, and is preparing text and figures for this report.
- The second 1st Quarterly Status Report was submitted to ADEQ on October 11, 2007.

Work Planned for November 2007:

General Site Activities

- No on-site activities are planned in November.

Current Conditions Report

- Work will continue on the CCR to meet the extended submittal deadline of November 20, 2007 to ADEQ.

Site Investigation Work Plan

- No activities are planned in November. These activities will follow completion of the Current Conditions Report.



Mr. J. Ryan Benefield, P.E.
Arkansas Department of Environmental Quality
November 9, 2007
Page 3

Site Investigation

- No activities are planned in November. These activities will follow completion and approval of the Work Plan.

Site Investigation Report

- No activities are planned in November. These activities will follow completion of the site investigation.

Feasibility Study

- No activities are planned in November. These activities will follow completion and approval of the Site Investigation Report.

Other Activities

- No activities are planned in November.

Project Issues Pending:

None identified.

Regulatory and Legal Issues Pending:

Order Provision V.16: Maintenance of Escrow:

Respondents submitted signed agreements to Arvest Bank during the last week of August and Arvest formally opened the account. The escrow account was fully funded as of October 1, 2007. A total of \$383,252 was deposited in the account in August. Revision of the Depository Agreement and Escrow Instructions has been executed and submitted to Arvest Bank by ExxonMobil and Helena Chemical.

Order Provision V.20: The Parties agree to negotiate in good faith to reach a separate agreement to conduct a Site investigation ("SI") and feasibility study as may be necessary.

Discussions with ADEQ to develop language for the separate supplemental agreement to satisfy this provision are expected to begin in the near future.

Meetings and Conference Calls with ADEQ:

- Telephone calls and electronic communication will occur as needed. ADEQ and the Group will meet on December 4, 2007 for the first quarterly meeting between ADEQ and the Group.



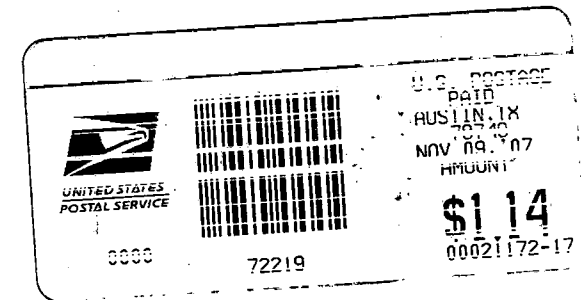
Mr. J. Ryan Benefield, P.E.
Arkansas Department of Environmental Quality
November 9, 2007
Page 4

If you have any comments regarding this report, please call me at (512) 494-0333.

Sincerely,
GEOMATRIX CONSULTANTS, INC.

Kelly Beck, P.G.
Project Manager

cc: ExxonMobil
Helena Chemical
Tyco Company Managers



5725 Highway 290 West, Suite 200B
Austin, Texas 78735-8722

Mr. J. Ryan Benefield, P.E.
Chief, Hazardous Waste Division
Arkansas Department of Environmental Quality
8001 National Drive

Little Rock, Arkansas 72210-8913

ADEQ001* 722093007 1707 13 11/14/07
NOTIFY SENDER OF NEW ADDRESS
ADEQ
5301 N SHORE DR
NORTH LITTLE ROCK AR 72118-5317

